

Remarks

Applicant has included a terminal disclaimer and fee to overcome the double patenting rejection.

With regard to the anticipation rejection, Applicant traverses. Kovac (6,200,134) does not disclose a light reflective device as the term is used in Applicant's claims. Kovac discloses a light guide 67 (or light transport device). This is materially different from a light reflective device such as a mirror or shiny glass or metal which serves to reflect light off of its surface and direct it into another direction. Kovac's light guide 67 does not perform the reflective function of a mirror or shiny glass or metal. Therefore Kovac does not anticipate claims 16 and 17.

With regard to the obviousness rejection, Kovac does not disclose a light reflective device as explained above because Kovac has a light guide 67 instead. Further, combining a parabolic light reflector to the device of Kovac would not have been functional. As shown in Figure 4, a very wide focusing lens 70 is used by Kovac to collect light. If a parabolic reflector were interposed between the focusing lens 70 and the LED's, either the parabolic reflector would have been entirely non-functional, or it would have interfered with the function of the Kovac focusing lens (70). Therefore, it is not possible to combine a parabolic reflector with Kovac without destroying Kovac's intended function. Accordingly, a parabolic reflector cannot be combined with Kovac and the obviousness rejection should be withdrawn.

Further, the patent examiner cites no reference in the dental curing light industry that discloses use of a parabolic reflector to focus light for curing a dental material. Without such a reference, the obviousness case is based on hindsight reconstruction, and such is not permitted by the case law. Without a reference in the dental curing light industry to suggest combination of a focusing lens and a parabolic reflector in a curing light, the prima facie obviousness case has not been made and should be withdrawn.

With regard to the obviousness rejection of claims 1-11 in light of Kovac, Wurster, Forehand and Mills, Applicant wishes to emphasize that he has claimed (i) a first light reflective device that

collects light from the semiconductors, (ii) a focusing lens that focuses the light from the first light reflective device into a concentrated beam, and (iii) a second light reflective device which reflects the concentrated beam to composite materials. The alleged combination of references does not yield this combination. Kovac is using a focusing lens instead of a first reflective device to collect light. Further, the Kovac lens does not concentrate a light beam from a first light reflective device as Applicant has claimed. It is the Kovac lens that concentrates light, not a light reflective device. Further, none of the references suggests a second light reflective device (as distinguished from a light guide or fiber) to redirect the focused light beam to a composite material. Therefore the prima facie case of obviousness has not been made.

Applicant requests withdrawal of the obviousness rejection.

Respectfully submitted this 17th day of May, 2004.



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